

From: [Chao Chen](#)
To: [Paul Schlosser](#)
Cc: [KennyCrump@email.com](#); [Paul White](#); [Christopher Portier](#); [Ravi Subramaniam](#); [Rory Conolly](#); [Thomas A. Weihsueh Chiu](#)
Subject: Re: critique of BBDR modeling
Date: 02/12/2010 11:08 AM

(b) (5)

(b) (5) Sorry for the rushing!

Chao

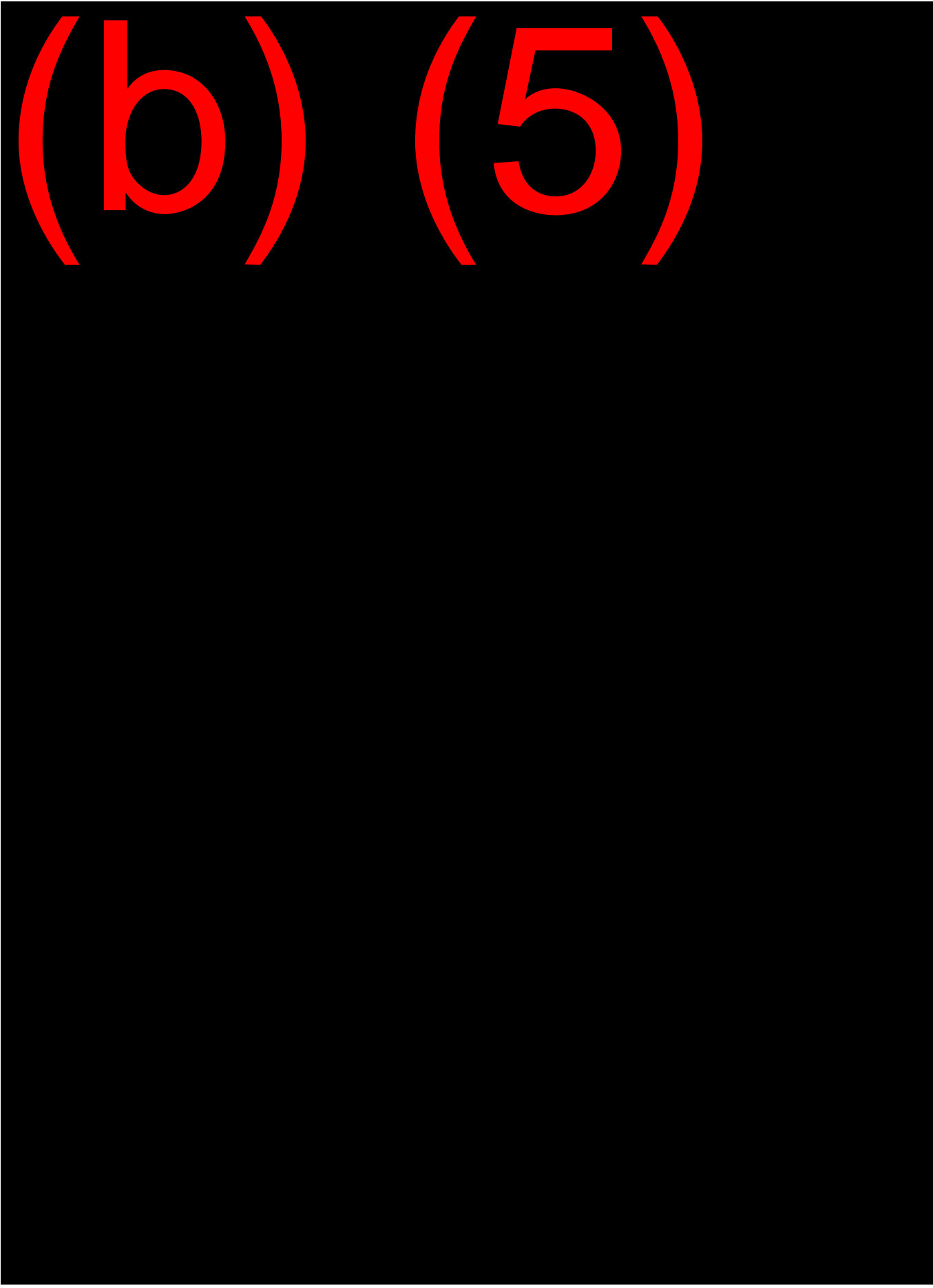
-----Paul Schlosser/RTP/USEPA/US wrote: -----

To: Chao Chen/DC/USEPA/US@EPA
From: Paul Schlosser/RTP/USEPA/US
Date: 02/12/2010 10:40AM
cc: KennyCrump@email.com, Paul White/DC/USEPA/US@EPA, Christopher Portier <portier@niehs.nih.gov>, Ravi Subramaniam/DC/USEPA/US@EPA, Rory Conolly/RTP/USEPA/US@EPA, Thomas A. <tlouis@jhsph.edu>, Weihsueh Chiu/DC/USEPA/US@EPA
Subject: Re: critique of BBDR modeling

Chao,

(b) (5)

(b) (5)



(b) (5)

(b) (5)

-Paul

Chao Chen---02/12/2010 08:21:37 AM---I was reluctant to join the discussion because I am going out of town for 2 weeks, but I though I ma

From: Chao Chen/DC/USEPA/US

To: Paul Schlosser/RTP/USEPA/US@EPA

Cc: KennyCrump@email.com, Paul White/DC/USEPA/US@EPA, Christopher Portier <portier@niehs.nih.gov>, Ravi Subramaniam/DC/USEPA/US@EPA, Rory Conolly/RTP/USEPA/US@EPA, Thomas A. <tlouis@jhsph.edu>, Weihsueh Chiu/DC/USEPA/US@EPA

Date: 02/12/2010 08:21 AM

Subject: Re: critique of BBDR modeling

I was reluctant to join the discussion because I am going out of town for 2 weeks, but I though I may start some healthy debate and discussions about the use of BBDR models. For now I offer my quick comments in the file attached below. If necessary, I'd suggest that we find some time to get all together to have a joint discussion.

[attachment "A View.docx" deleted by Paul Schlosser/RTP/USEPA/US]

Chao

Paul Schlosser---02/11/2010 10:10:22 AM---Ravi, I've now read the article in it's entirety, and find it extremely discouraging of ... well, re

From: Paul Schlosser/RTP/USEPA/US

To: Ravi Subramaniam/DC/USEPA/US@EPA

Cc: Chao Chen/DC/USEPA/US@EPA, KennyCrump@email.com, Paul White/DC/USEPA/US@EPA, Christopher Portier <portier@niehs.nih.gov>, Rory Conolly/RTP/USEPA/US@EPA, Thomas A. <tlouis@jhsph.edu>, Weihsueh Chiu/DC/USEPA/US@EPA

Date: 02/11/2010 10:10 AM

Subject: Re: critique of BBDR modeling

Ravi,

(b) (5)

(b) (5)

-Paul

Ravi Subramaniam---02/03/2010 03:14:20 PM---Paul, Thank you for taking the time to critique our BBDR commentary. I'm sorry it has taken me a whi

From: Ravi Subramaniam/DC/USEPA/US

To: Paul Schlosser/RTP/USEPA/US@EPA

Cc: Paul White/DC/USEPA/US@EPA, Rory Conolly/RTP/USEPA/US@EPA, Weihsueh Chiu/DC/USEPA/US@EPA, Christopher Portier <portier@niehs.nih.gov>, KennyCrump@email.com, Louis, Thomas A. <tlouis@jhspk.edu>, Thomas A. <tlouis@jhspk.edu>, Chao Chen/DC/USEPA/US@EPA

Date: 02/03/2010 03:14 PM

Subject: Re: critique of BBDR modeling

Paul,

(b) (5)

At this time there may be so much uncertainty regarding molecular level processes and their parameters that the uncertainty in their predictions is as much as appears to be the case in use of statistical models. But I also wonder if the apparent level of (un)certainly that comes from doing dose-response modeling with a single statistical model, which is after all based on certain assumptions about rate-limiting biological processes, is false? How do we know that the linearized multi-stage model provides an accurate extrapolation of cancer risk from high- to low-doses?

(b) (5)

Ravi Subramaniam
Environmental Health Scientist
NCEA-Washington, ORD, EPA
N-7922, Two Potomac Yard, Crystal City
(703) 347-8606, (301) 515-2701 (alternate office)

Paul Schlosser---01/12/2010 10:30:09 AM---Thanks, Ravi. I'll have to read through it more carefully when I can.

From: Paul Schlosser/RTP/USEPA/US

To: Ravi Subramaniam/DC/USEPA/US@EPA

Cc: Paul White/DC/USEPA/US@EPA, Rory Conolly/RTP/USEPA/US@EPA

Date: 01/12/2010 10:30 AM

Subject: Re: critique of BBDR modeling

Thanks, Ravi.

I'll have to read through it more carefully when I can.

(b) (5)

Well, those are my thoughts for now.

-Paul

Ravi Subramaniam---01/12/2010 08:56:36 AM---The disclaimer has been taken care of. It was there in the originally submitted version but got acc

From: Ravi Subramaniam/DC/USEPA/US

To: Paul White/DC/USEPA/US@EPA, Paul Schlosser/RTP/USEPA/US@EPA, Rory Conolly/RTP/USEPA/US@EPA

Date: 01/12/2010 08:56 AM

Subject: Re: critique of BBDR modeling

The disclaimer has been taken care of. It was there in the originally submitted version but got accidentally deleted in the course of edits during the review process as the format of the paper changed from a full-length to a commentary. Thanks for bringing the issue to our attention.

Ravi.

Ravi Subramaniam
Environmental Health Scientist
NCEA-Washington, ORD, EPA
N-7922, Two Potomac Yard, Crystal City
(703) 347-8606, (301) 515-2701 (alternate office)

Paul White---01/07/2010 04:49:42 PM---Hi Rory, Kenny will be checking with EHP to see that disclaimer is included - it was once there but

From: Paul White/DC/USEPA/US

To: Rory Conolly/RTP/USEPA/US@EPA

Cc: Paul Schlosser/RTP/USEPA/US@EPA, Ravi Subramaniam/DC/USEPA/US@EPA

Date: 01/07/2010 04:49 PM

Subject: Re: critique of BBDR modeling

Hi Rory,

(b) (5)

Best,
Paul

PS, from seeing the addressees on your earlier note, I was wondering if there was some discussion group that might be active on modeling issues. If so I'd be happy to be included.

Rory Conolly---01/07/2010 03:15:33 PM---The paper has been accepted at EHP, but the copy we've been looking at isn't a galley proof, so perh

From: Rory Conolly/RTP/USEPA/US
To: Paul Schlosser/RTP/USEPA/US@EPA
Cc: Paul White/DC/USEPA/US@EPA
Date: 01/07/10 03:15 PM
Subject: Re: critique of BBDR modeling

The paper has been accepted at EHP, but the copy we've been looking at isn't a galley proof, so perhaps a disclaimer will appear in that version. I suspect that this article will be viewed as representing EPA policy whether or not it contains the disclaimer.

- Rory

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Rory B. Conolly, Sc.D.
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MD B143-06
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U.S.A.
e-mail: Conolly.Rory@epa.gov
Telephone: +1.919.541.3350
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Paul Schlosser---01/07/2010 11:18:04 AM---I just looked at the abstract, but then... there appears to be no disclaimer, "This article represen

From: Paul Schlosser/RTP/USEPA/US
To: Paul White/DC/USEPA/US@EPA
Cc: Rory Conolly/RTP/USEPA/US@EPA
Date: 01/07/2010 11:18 AM
Subject: Re: critique of BBDR modeling

I just looked at the abstract, but then... there appears to be no disclaimer, "This article represents the views of the authors," etc. Should that not be included?!

-Paul

Rory Conolly---01/07/2010 09:32:46 AM---Here's a paper that's been accepted by Environmental Health Perspectives of which you should be aware

From: Rory Conolly/RTP/USEPA/US

To: Anna Lowit/DC/USEPA/US@EPA, Rita Schoeny/DC/USEPA/US@EPA, Edward Ohanian/DC/USEPA/US@EPA, Paul Schlosser/RTP/USEPA/US@EPA, Eva McLanahan/RTP/USEPA/US@EPA, Cecilia Tan/RTP/USEPA/US@EPA, Rocky Goldsmith/RTP/USEPA/US@EPA, Marina Evans/RTP/USEPA/US@EPA, Christopher Eklund/RTP/USEPA/US@EPA, Elaina Kenyon/RTP/USEPA/US@EPA

Date: 01/07/2010 09:32 AM

Subject: critique of BBDR modeling

Here's a paper that's been accepted by Environmental Health Perspectives of which you should be aware.

- Rory

[attachment "EHP BBDR Commentary.pdf" deleted by Paul Schlosser/RTP/USEPA/US]

What Role for Biologically-Based Dose-Response Models in Estimating Low-Dose Risk? 1

Kenny S. Crump¹, Chao Chen², Weihsueh A. Chiu², Thomas A. Louis³, Christopher J. Portier⁴, Ravi P. Subramaniam², Paul D. White²

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Rory B. Conolly, Sc.D.
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